Kerry Culpepper

From:	Robinson, Joshua ███████████████████ >
Sent:	Friday, June 25, 2021 6:38 AM
To:	Kerry Culpepper; Pare, Oliver
Cc:	Klar, Austin; Saad, Charlie; 'Weslow, David'; 'Meltzer, Ari'; ███████████████████
Subject:	RE: In Re Frontier Communications Corporation, 20-22476 (RDD)(copyright claimants)

Kerry,

Frontier is not amenable to this proposal. You had ample notice of the Record Companies' motion and opportunity to join it weeks ago, and did not. You also filed your claims in the Bankruptcy Court before the Record Companies, which makes your withdrawal request even more untimely than theirs. Additionally, you affirmatively consented on behalf of all of your clients to litigate before the Bankruptcy Court and even requested an adjudication schedule. Accordingly, we will not stipulate that you can simply tack onto the Record Companies' motion at this late stage. To the extent you formally move to withdraw the reference as to your clients' claims, we will oppose that motion in a manner consistent with our current opposition to the Record Companies' withdrawal motion.

Best,

Joshua Robinson

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From: Kerry Culpepper <kculpepper@culpepperip.com>
Sent: Thursday, June 24, 2021 1:22 PM
To: Robinson, Joshua ███████████████ >; Pare, Oliver ██████████ >
Cc: Klar, Austin ███████████ >; Saad, Charlie ███████████ >; 'Weslow, David' ███████ ; 'Meltzer, Ari' ███████ >; ███████ ;
Subject: RE: In Re Frontier Communications Corporation, 20-22476 (RDD)(copyright claimants)

Joshua,

Further re our previous telephone conversation, we have decided that it is best to explicitly join the song holders' motion to withdraw the reference.
During the status hearing I made this point, and the Judge said we would need to work out a mechanism for my claimants to move to the District Court if the song holders' motion was granted. I believe it would be a most efficient for the Court and everyone if we just did a joint stipulation that the movie claimants join the motion and if the motion is granted, the reference with respect to the movie claimants' claim will be withdrawn too.

Please let me know if Frontier agrees.

Regards,

Kerry S. Culpepper

Exhibit "1"